

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Suzanne Genereux, et al.)	
)	
Plaintiffs,)	
)	
v.)	Case No. 04-cv-12137 JLT
)	
American Beryllia Corp., et al.)	
)	
Defendants.)	

JOINT MOTION OF ALL PARTIES TO CONTINUE FINAL PRETRIAL DATE

The parties respectfully request a continuation of the final pretrial from November 7, 2006 to November 29, 2006 or such other date as the Court may set.

The Court's June 22, 2006 Order set plaintiff's expert disclosures for October 2, 2006 and defendants' expert disclosures for November 1, 2006. Based on the current schedule and Loc. R. 16.5, the parties would be required to exchange exhibit lists, witness lists and submit a joint pretrial memorandum (including objections to exhibits under Loc. R. 16.5(d)(12) before defendants' experts have completed their reports, before those experts identify the exhibits on which they rely, and before defendants even determine whether they will be called.

To avoid the need for amended exhibit lists, witness lists and pretrial memorandum, all parties jointly request a three week continuance of the final pretrial hearing.

Dated: October 5, 2006

Respectfully submitted,

/s/ Robert S. Faxon
Jeffery D. Ubersax
Robert S. Faxon
Jones Day
North Point
901 Lakeside Ave.
Cleveland, Ohio 44114-1190
Tel: (216) 586-3939
Fax: (216) 579-0212

Attorneys for Defendant Brush Wellman Inc.

/s/ Ruben Honik
Ruben Honik, Esq.
Stephan Matanovic, Esq.
Golomb & Honik, PC
121 S. Broad St., 9th fl.
Philadelphia, PA 19107
Tel: 215-985-9177

Attorney for Plaintiffs

/s/ Robert Nadeau
Robert Nadeau, Esq.
Frances Lindemann, Esq.
Nadeau & Associates
1332 Post Road, Suite 4A
Wells, Maine 04090
Tel: 207-324-3500

Attorney for Defendant Hardric Laboratories, Inc.

/s/ William F. Ahern
William F. Ahern
Mandi Jo Hanneke
Clark, Hunt & Embry
55 Cambridge Parkway
Cambridge, MA 02142
Tel: 617-494-1920

Attorney for Defendant American Beryllia
Corp.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 4th day of October 2006, a true and correct copy of the foregoing **Motion To Continue Final Pretrial Date** was served via U.S. mail, first class postage prepaid, to the following:

Leo V. Boyle, Esq.
Meehan, Boyle, Black & Fitzgerald, PC
Two Center Plaza
Suite 600
Boston, MA 02108
617-523-8300

Attorney for Plaintiffs

Ruben Honik, Esq.
Stephan Matanovic, Esq.
Golomb & Honik, PC
121 S. Broad St., 9th fl.
Philadelphia, PA 19107

Attorney for Plaintiffs

William F. Ahern
Mandi Jo Hanneke
Clark, Hunt & Embry
55 Cambridge Parkway
Cambridge, MA 02142
617-494-1920

Attorney for Defendant American Beryllia
Corp.

Robert Nadeau, Esq.
Frances Lindemann, Esq.
Nadeau & Associates
1332 Post Road, Suite 4A
Wells, Maine 04090
207-324-3500

Attorney for Defendant Hardric Laboratories, Inc.

Ronald M. Jacobs, Esq.
Conn, Kavanaugh, Rosenthal, Peisch & Ford, LLP
Ten Post Office Square, 4th Floor
Boston, MA 02109
617-482-8200

Attorneys for Defendant Raytheon

/s/ Alan M. Spiro

Attorney for Brush Wellman Inc.